



December 24, 2020

Honorable Howard Zucker, MD, JD  
Commissioner of Health, NYS Department of Health  
Corning Tower, 14<sup>th</sup> Floor  
Albany, NY 12237

Dear Dr. Zucker and Vaccination Regional Advisory Principals:

I am writing with an urgent request to the Department and to each Regional Advisory Task Force (RATF) to explicitly cite home health care, home care and hospice personnel (referred to further as “home care”) in the vaccine prioritization level for Priority 1 vaccination.

As home care was explicitly listed in the defined healthcare groups for Phase 1a vaccination by the Advisory Committee on Immunization Practices, it is critical for consistency and clarity for all concerned for NYS to timely follow.

While other states have explicitly named home care workers as priority recipients of early COVID -19 immunizations, NYS’s guidance to date has been inexact on this critical point. Moreover, as NYS has otherwise explicitly cited other health personnel in its guidance, home care’s absence has caused concern and confusion within the industry and across sectors.

Home care workers truly must be identified and prioritized by name as has been the case with other health care personnel who work in facilities and congregate and community settings, such as hospital staff, nursing home staff, congregate care staff, EMS workers, coroners, medical examiners, and funeral home directors. In this context, home care workers include nurses, physical and occupational therapists, speech and language pathologists, medical social workers, home health aides, personal care aides and other health care professionals providing the full array of health care services to individuals in their homes. These personnel are employed by certified home health agencies, licensed home care services agencies, hospices, and long-term home health care programs. They provide health care services to tens of thousands of medically frail New Yorkers every day.

Home care personnel from these provider-types are an integral component of the health system and during this pandemic have proven essential in providing relief to and sustaining an already overburdened health care system. Home care is essential in combatting COVID-19 and these at-risk workers must be prioritized explicitly for vaccination to protect themselves and the thousands of patients who receive care from them. Home care patients with their high-risk conditions and multiple comorbidities are among the most at-risk individuals for hospitalization, intubation and death from COVID-19.

We further ask that home care be represented in each of the 10 Vaccine RATF to ensure that home care/hospice personnel and patients are represented in the effort to vaccinate the most vulnerable individuals first. The presence of home care representation on each is essential. HCA has recently been invited to participate on the Capital District RATF and we thank Dr. McKenna for his foresight in that regard. We respectfully request the other RATFs to consider home care representation on their RATFs.

We realize and understand the extreme enormity and challenges of ensuring accurate, clear and effective communication during this time. We ask that you alleviate the confusion and concern regarding vaccine priority for home care/home health care personnel by explicitly and clearly including them in the list of the populations included in Priority 1.

Thank you for your attention to this matter. We look forward to your replies and wish you a healthy and safe New Year.

Sincerely,

*Al Cardillo*

Al Cardillo  
President and CEO

cc: Regional Advisory Task Force Principals